



KERR-McGEE CHEMICAL LLC

POST OFFICE BOX 55 - HENDERSON, NEVADA 89009

SFUND RECORDS GTR
109780

July 25, 2000

Ms. Brenda Pohlmann
Remediation Branch Supervisor
Nevada Division of Environmental Protection
555 E. Washington, Suite 4300
Las Vegas, NV 89101

Dear Ms. Pohlmann:

Subject: Perchlorate Activity Status

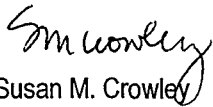
Following is the current status of Kerr-McGee Chemical LLC's (Kerr-McGee) perchlorate related activities as outlined in the Perchlorate Consent Agreement (July 26, 1999) and its supporting Work Plans:

- ❖ Kerr-McGee's commitment to remove perchlorate from surfacing groundwater (seep) is continuing, utilizing Calgon Carbon's ion exchange process. During June 2000, 7,000 lbs of perchlorate were removed from the surface stream before it entered the wash. To date, 32.3 tons have been removed since ion exchange operation began in November 1999. The stream flow is down, dropping from an average of 250 gpm at the beginning of June to 210 gpm at the close. Perchlorate concentration is up, averaging 88 ppm over the month. These conditions appear typical of summertime conditions in the stream, although they represent lower flows than seen during 1999's summertime period. Although the ion exchange system is running well, we continue to have occasional operational difficulties due to the Clark County earthen dam installed upgradient from the stream capture point. Kerr-McGee is hopeful that this dam will be removed at the earliest opportunity.
- ❖ On-site groundwater continues to be extracted and treated for chromium removal, then placed in the on-site groundwater holding basin for eventual treatment for perchlorate removal. During June, approximately 13,150 lbs of perchlorate were removed from the shallow aquifer. Since initiation of impoundment in December 1998, considering the average perchlorate concentration of 1,500 ppm, 164 tons of perchlorate have been removed from the on-site shallow groundwater. The holding basin has had a very high evaporation rate due to lower than normal rainfall and above average temperature and wind conditions.
- ❖ Kerr-Gee is continuing transfer of groundwater extracted from the Pittman Lateral area to its groundwater holding basin by utilizing a tanker truck. Over the 239 days this transfer has been active, approximately 1.58 tons of perchlorate have been removed from the groundwater.
- ❖ Field activities to investigate hydrologic condition in the seep vicinity are continuing. The nested well installations, the seep area reconnaissance, and the near wash groundwater seep sampling are complete. Groundwater tracer studies are to be completed in September following NDEP approval of the tracer selection.
- ❖ NDEP's Bureau of Water Pollution Control is developing an NPDES discharge permit for perchlorate treated waters. Draft Permit #NEV0023060 was public noticed, and NDEP has received public comments. Until the NPDES permit is approved for use, Kerr-McGee has continued seep stream perchlorate removal under the authorization of a Temporary Discharge Permit.

- ❖ Engineering (by Biothane Corporation and Applied Research Associates) is nearing completion on the perchlorate treatment system. The cost estimate and schedule were received early in July for Kerr-McGee internal review and approval. Issued for construction drawings are expected in early August. Pre-construction activities, such as site preparation, have begun at the Henderson plant. Additional activities are pending a grading permit, currently in Clark County Planning and Zoning's control. This permit is pending reviews and resultant approval letters from NDEP and from Clark County Health District to continue the grading permit review process. Documents (drawings) have been submitted to NDEP's Las Vegas office for this review process. Additional information will be forwarded as it is available. It is expected that slightly over a year will be needed to construct and start up the biological treatment facility once internal approval and NDEP permits and approvals have been received.
- ❖ Pipeline and Lift Station #2 engineering drawings are 75 percent complete. Draft easements have been prepared for the entire run of the pipeline and for Lift Station #2. Maintenance work has begun on the section of existing pipeline that will be used to cross Warm Springs Road and Boulder Highway for the treated water return to the seep stream. This work is expected to be complete in 2-3 weeks. Legal descriptions and exhibits are being completed for the draft easements as the final engineering drawings are being completed.
- ❖ Kerr-McGee has been requested by NDEP to draft a second Consent Agreement as a follow-on to the existing Consent Agreement. The second Agreement would cover the permanent perchlorate treatment system, while the first covered the temporary seep issues.

KMC is committed to act responsibly and cooperate fully with local, state, and federal officials in determining appropriate remedial actions. Please feel free to contact me at (702) 651-2200 if you have any questions related to this information. Thank you.

Sincerely,


Susan M. Crowley
Staff Environmental Specialist

By certified mail

cc: PSCorbett
EMSpore
FRStater
TWReed
WOGreen
RHJones
LKBailey
ALDooley
Rick Simon, ENSR
Robert Kelso, NDEP
Doug Zimmerman, NDEP
Jeanne-Marie Bruno, Metro Water District Of Southern California
Barry Conaty, City of Henderson
Pat Mulroy, Southern Nevada Water Authority
Kevin Mayer, EPA Region IX